

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

REBECCA BROWN and AUGUST
TERRENCE ROLIN, on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

TRANSPORTATION SECURITY
ADMINISTRATION, et al.,

Defendants.

Civil Action No. 2:20-cv-64-LPL

DECLARATION OF VICKI L. RASHID

I, Vicki L. Rashid, hereby declare that I am the Forfeiture Counsel of the Drug Enforcement Administration (DEA), United States Department of Justice, and in that capacity supervise a variety of activities related to forfeiture within the DEA. These activities include the return of seized property following a decision by the U.S. Attorney to decline to commence a judicial forfeiture proceeding against that property. I make this affidavit based on my personal knowledge and my review of the information reported in a database maintained by the U.S. Department of Justice, the documents attached to this affidavit and the complaint filed in the above-captioned action. I affirm that the following activities occurred with respect to the \$82,373 referenced in that complaint.

1. On August 26, 2019, a DEA task force officer seized \$82,373 from Rebecca Brown for the purpose of Federal forfeiture pursuant to 21 U.S.C. § 881(a)(6). The DEA office in Pittsburgh, Pennsylvania subsequently prepared and submitted a forfeiture report to this office.

An attorney or paralegal reviewed this report to determine if the DEA field office provided adequate information to support administrative forfeiture proceedings against the property. This process included a legal review of the evidence that existed to seize the \$82,373. Based on this thorough review, the DEA accepted this case for administrative forfeiture.

2. On October 11, 2019, pursuant to 19 U.S.C. § 1607(a), and 18 U.S.C. § 983(a), the DEA sent written notice of this seizure by certified mail, return receipt requested, to Rebecca Brown and August Terrance Rolin. Exhibits A and B.

3. Pursuant to 28 C.F.R. § 8.9(a), the DEA posted notice of this seizure on Forfeiture.gov, an official internet government forfeiture website, for a period of 30 consecutive days beginning on October 28, 2019, and ending on November 26, 2019. Exhibit C.

4. The internet posting and mailed notices explained the option of filing a claim with the DEA Forfeiture Counsel in order to contest the forfeiture action in United States District Court. Pursuant to 18 U.S.C. § 983(a)(2)(B), the mailed notices stated that the deadline to file a claim was November 15, 2019. If the mailed notice was not received, the internet posting stated that the deadline to file a claim was December 26, 2019. In addition, the internet posting and mailed notices explained the option of filing a petition for remission or mitigation.

5. The DEA received claims from both Rebecca Brown and August Terrance Rolin on November 12, 2019.

6. On November 27, 2019, the DEA referred these claims to the Office of the United States Attorney for the Western District of Pennsylvania, requesting the commencement of judicial forfeiture proceedings.

7. The United States Attorney for the Western District of Pennsylvania declined to initiate civil judicial forfeiture proceedings against the \$82,373 on February 7, 2020.

8. On February 28, 2020, the DEA notified the counsel for Rebecca Brown and August Terrance Rolin, the plaintiffs in the above-captioned action, of the decision to return the currency. Exhibit D. The DEA also requested information from the owner of the currency in order to effect the electronic transfer of the funds. Id.

9. The counsel for the plaintiffs provided the requested information for August Terrance Rolin on March 5, 2020. Exhibit E.

10. On March 23, 2020, a deposit of \$82,373 was made to the account identified by the counsel for August Terrance Rolin. Exhibit F.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

Dated: May _____, 2020
Burke, Virginia

Vicki L. Rashid